

The Honorable Lauren King

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AMAZON.COM, INC., a Delaware  
corporation; AMAZON.COM SERVICES LLC,  
a Delaware limited liability company; and THE  
THOUGHT & EXPRESSION CO., INC., a  
Virginia corporation,

Plaintiffs,

v.

AMANDEEP SINGH, an individual; and  
BHUSHAN KUMAR, an individual; and DOES  
1-10,

Defendants.

No. 2:24-cv-01464-LK

**DECLARATION OF ROBERT  
GARRETT IN SUPPORT OF  
PLAINTIFFS' *EX PARTE* MOTION  
FOR ALTERNATIVE SERVICE**

I, Robert Garrett, declare and state as follows:

1. I am over the age of 18 and competent to testify to the matters stated herein. I have been employed by Amazon.com, Inc. ("Amazon"), or its subsidiaries, since June 24, 2019. I have personal knowledge of the facts in this declaration or have acquired this knowledge through my review of records kept in the regular course of business. The statements made below are true to the best of my knowledge and belief. I make them in support of Plaintiffs' *Ex Parte* Motion for Alternative Service.

2. My current role is Principal Risk Manager for the Amazon Counterfeit Crimes Unit, where I am responsible for investigating bad actors suspected of selling counterfeit

products in Amazon's stores. The Amazon Counterfeit Crimes Unit is a global team dedicated to pursuing bad actors and holding them accountable to the fullest extent of the law, including by referring them to law enforcement and by pursuing civil lawsuits.

3. Amazon offers third-party sellers and brand owners the ability to sell products in the Amazon.com store (the "Amazon Store") by registering Amazon selling accounts. Amazon uses advanced technology and expert human reviewers to verify the identities of potential sellers. When prospective sellers apply to sell in Amazon's stores, they are required to provide a form of government-issued photo ID, along with other information about their business. Amazon employs advanced identity detection methods such as document forgery detection, image and video verification, and other technologies to quickly confirm the authenticity of government-issued IDs and whether such IDs match the individual applying to sell in Amazon's stores. In addition to verifying IDs, Amazon's systems analyze numerous data points, including behavior signals and connections to previously detected bad actors, to detect and prevent risks. Despite these efforts, a small number of bad actors attempt to circumvent Amazon's systems by submitting fraudulent and deliberately false information to Amazon, as Defendants did here.

4. I have analyzed the data provided to Amazon by the persons responsible for the selling accounts that sold counterfeit Thought Catalogue books, listed below (the "Selling Accounts"). The following email addresses were provided to Amazon when the Selling Accounts were registered:

<u><b>Selling Account</b></u>	<u><b>Email Address</b></u>
Augstin Retail	retailagustin@gmail.com
Borning	borningllc.panorama@gmail.com
Smarttabs	smarttabs.panorama@gmail.com
Golden Store	goldenstore.panorama@gmail.com

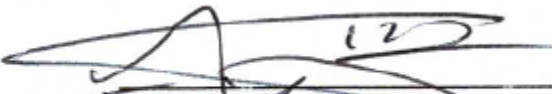
5. The persons responsible for the Selling Accounts, like all sellers in the Amazon Store, registered these email addresses in order to create their Selling Accounts, access

1 Amazon's Seller Central,<sup>1</sup> and conduct business through their Selling Accounts. These email  
2 addresses are also the primary means of communication from Amazon and the operators of the  
3 Selling Accounts, and were used by the operators of the Selling Accounts to log into the Selling  
4 Accounts.

5 6. In order to facilitate further investigation into the identities and whereabouts of  
6 the bad actors responsible for the Selling Accounts, I provided Amazon's counsel at Davis  
7 Wright Tremaine with the identification, contact, and banking information that was provided to  
8 Amazon in connection with registration of the Selling Accounts, as well as information reflecting  
9 the IP networks used to log in to the Selling Accounts.

10  
11 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
12 knowledge.

13  
14 EXECUTED this 16<sup>th</sup> day of October, 2024, in Arlington, Virginia.

15  
16   
17 ROBERT GARRETT

18  
19  
20  
21  
22  
23  
24  
25  
26  
27 <sup>1</sup> "Seller Central" is the online portal that sellers use to access their selling accounts, list products for sale, manage sales and inventory, track payments and returns, and manage advertising programs, among other things.